



September 15, 2003

Ms. Christy Brown, RCRA Project Manager
United States EPA, Region 10
1200 Sixth Avenue, Mail Stop WCM-126
Seattle, WA 98101

Subject: **September 15, 2003, Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Brown:

This letter provides the September 15, 2003, progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from August 15, 2003, to September 15, 2003.

Significant Developments This Period

This section discusses significant developments for the referenced reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- On August 18, 2003, Baxter submitted a letter to EPA requesting an extension to the field activities in accordance with the April 10, 2003 – Site Investigation: Supplemental Groundwater Investigation Work Plan.

Anticipated Developments Next Period

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will be conducting field activities in accordance with the April 10, 2003 – Site Investigation: Supplemental Groundwater Investigation Work Plan.
- Baxter will continue to implement elements of the SI Work Plan, including database compilation and data evaluation.



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Anticipated Problems and Problem Resolution

This section discusses anticipated problems, and planned resolution of past or anticipated problems.

No new problems or issues have been identified at the facility, other than those mentioned in previous progress reports.

Other Information

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- On August 15, 2003, Baxter submitted Plans and Specifications for the Site Civil Process to the City of Arlington for Stormwater Improvement Measures.
- On August 18, 2003, Baxter sent Washington State Department of Ecology (Ecology) a copy of the Plans and Specifications for Stormwater Improvement Measures.
- On September 4, 2003, Baxter submitted Plans and Specifications for the Building Permit to the City of Arlington for Stormwater Improvement Measures.
- Baxter will continue excess stormwater treatment in accordance with the approved phased approach for stormwater management.
- Baxter will continue to develop City of Arlington Design and Approval Documents for the proposed stormwater treatment system.

Certification

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and

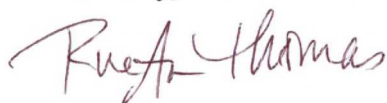
complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: 

Name: RueAnn Thomas
Title: Environmental Programs Director
Date: August 15, 2003

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (541) 689-3801.

Sincerely,



RueAnn Thomas
Environmental Programs Director

cc: Jeanne Tran, Ecology
Georgia Baxter, J. H. Baxter & Co.
Mary Larson, J. H. Baxter & Co.
J. Stephen Barnett, Premier Environmental Services, Inc.